

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND WISCONSIN DEPARTMENT  
OF JUSTICE'S STIPULATION AND  
[PROPOSED] ORDER EXTENDING  
DEADLINE TO COMPLETE WISCONSIN  
FACT WITNESS CASIE SULZLE'S  
DEPOSITION**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, Wisconsin Department of Justice (“WI DOJ”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Under the schedule ordered by Magistrate Judge Kang on July 2, 2025, the current deadline for Meta to complete the depositions of State of Wisconsin (“Wisconsin”) witnesses is August 29, 2025. *See* ECF 2091.

2. Meta and the WI DOJ have worked in good faith to confer about, notice, and schedule Wisconsin witnesses. For Wisconsin Department of Public Instruction employee Casie Sulzle’s deposition, the Parties originally scheduled the deposition for July 1, 2025. But the day before her deposition, agency counsel for the Wisconsin Department of Public Instruction advised that Ms. Sulzle was on leave under the Family Medical Leave Act and not available for her deposition. Following additional conferrals, the WI DOJ told Meta that Ms. Sulzle will be on leave until at least September 2, 2025, after which time the WI DOJ will provide Meta with Ms. Sulzle’s availability for deposition.

3. In light of Ms. Sulzle’s leave, the Parties have agreed to extend the existing August 29, 2025 deadline for Meta to complete Ms. Sulzle’s deposition. The parties have agreed to extend the deadline through September 30, 2025, and given the ongoing nature of Ms. Sulzle’s leave agree to work together in good faith and seek any further extensions from this court as needed.

4. This Court has previously extended Meta’s deadline to complete fact and Rule 30(b)(6) depositions of State witnesses twice. *See* ECF 1696, 2091. This stipulated extension of the deadline for Meta to complete Ms. Sulzle’s deposition does not and will not affect any other deadlines already set or that may be set in this action, nor the deposition time limits already set in ECF 1696, nor does it affect any party’s or non-party’s rights in relation to any other deadlines.

5. Therefore, the Parties agree that the following shall apply:

- a. Subject to the Court’s approval, Meta’s deadline to complete its deposition of Casie Sulzle shall be extended through and including September 30, 2025.

1  
2 DATED: August 29, 2025

Respectfully submitted,

COVINGTON & BURLING LLP

3 By: /s/ Ashley M. Simonsen

4 Ashley M. Simonsen, SBN 275203

COVINGTON & BURLING LLP

5 1999 Avenue of the Stars

Los Angeles, CA 90067

6 Telephone: (424) 332-4800

7 Facsimile: + 1 (424) 332-4749

Email: [asimonsen@cov.com](mailto:asimonsen@cov.com)

8 *Attorneys for Meta Platforms, Instagram, LLC; Meta*  
9 *Payments, Inc.; and Meta Platforms Technologies, LLC*

10 JOSHUA L. KAUL

11 Attorney General State of Wisconsin

12 By: /s/ Brittany A. Copper

13 Brittany A. Copper, Assistant Attorney General

14 WI State Bar # 1142446, *pro hac vice app*  
*forthcoming*

Wisconsin Department of Justice

15 Post Office Box 7857

Madison, Wisconsin 53707-7857

16 Phone: (608) 261-9224

Email: [Brittany.copper@widsoj.gov](mailto:Brittany.copper@widsoj.gov)

17 *Attorneys for Plaintiff State of Wisconsin*  
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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 29, 2025

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen

**[PROPOSED] ORDER**

By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

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Magistrate Judge Hon. Peter H. Kang